

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In Re:	)	Chapter 7 Case
	)	
Norma Jean Griffin,	)	Case No. 15-26407
	)	
Debtor.	)	Hon. A. Benjamin Goldgar

**NOTICE OF MOTION**

TO: See Attached List

PLEASE TAKE NOTICE that on **Monday, August 29, 2022, at 9:30 AM**, I will appear before the Honorable A. Benjamin Goldgar, or any judge sitting in that judge's place, **and present the United States Trustee's Motion for Order Reopening Chapter 7 Case Pursuant to 11 U.S.C. § 350(B) and Rule 5010 of the Federal Rules of Bankruptcy Procedure and for Authorization to Appoint a Chapter 7 Trustee and Reassigning Case**, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at **1-669-254-5252** or **1-646-828-7666**. Then enter the meeting ID and passcode.

**Meeting ID and password.** The meeting ID for this hearing is **161 500 0972** and the password is **726993**. The meeting ID and password can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ Adam G. Brief  
Adam G. Brief, Assistant U.S. Trustee  
OFFICE OF THE U.S. TRUSTEE  
219 S. Dearborn Street  
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[adam.brief@usdoj.gov](mailto:adam.brief@usdoj.gov)  
(202) 503-7104

**CERTIFICATE OF SERVICE**

I, Adam G. Brief, Assistant U.S. Trustee, certify that on August 16, 2022, I caused to be served copies of the **Notice of Motion and Motion for Order Reopening Chapter 7 Case Pursuant to 11 U.S.C. § 350(B) and Rule 5010 of the Federal Rules of Bankruptcy Procedure and for Authorization to Appoint a Chapter 7 Trustee and Reassigning Case** on the ECF Registrants shown below *via* the Court's Electronic Notice for Registrants and *via* First Class US Mail by BMC Group on all other entities shown at the addresses listed below. A supplement to this Certificate of Service from BMC Group will be filed.

/s/ Adam G. Brief

**SERVICE LIST**

**Registrants Served Through the Court's Electronic Notice for Registrants:**

- **Richard M. Fogel** rfogel@shawfishman.com, il72@ecfcbis.com;richard-fogel-1441@ecf.pacerpro.com
- **Patrick S Layng** USTPRegion11.ES.ECF@usdoj.gov
- **Keith Levy** amps@manleydeas.com
- **Charles L. Magerski** Cmagerski@sulaimanlaw.com, charles@clmlawgroup.com;magerskicr85454@notify.bestcase.com
- **Jose G Moreno** nd-one@il.cslegal.com
- **Gloria C Tsotsos** bkpleadingsNORTHERN@il.cslegal.com

**Parties Served via First Class Mail:**

Norma Jean Griffin  
5734 S Sangamon Street  
Chicago, IL 60621

Norma Jean Griffin  
4830 W. Kamerling Ave.  
Chicago, IL 60651

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In Re:	)	Chapter 7 Case
	)	
Norma Jean Griffin,	)	Case No. 15-26407
	)	
Debtor.	)	Hon. A. Benjamin Goldgar

**MOTION FOR ORDER REOPENING CHAPTER 7 CASE  
PURSUANT TO 11 U.S.C. § 350(b) AND RULE 5010 OF  
THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND  
FOR AUTHORIZATION TO APPOINT A CHAPTER 7 TRUSTEE AND  
REASSIGNING CASE**

Patrick S. Layng, the United States Trustee for the Northern District of Illinois (“U.S. Trustee”), by and through the Assistant U.S. Trustee, Adam G. Brief, hereby requests entry of an order reopening this case pursuant to Section 350(b) of the Bankruptcy Code and Bankruptcy Rule 5010 and for authorization to appoint a chapter 7 trustee and reassigning case. In support of his motion, the U.S. Trustee respectfully states as follows:

**JURISDICTION**

1. The Court has jurisdiction to hear and determine this proceeding under 28 U.S.C. § 157(b)(2) and IOP 15(a) and Local Rule 40.3.1 of the United States District Court for the Northern District of Illinois.

2. Movant is the U.S. Trustee for the Northern District of Illinois and is charged with supervising the administration of bankruptcy cases under 28 U.S.C. § 586(a). The U.S. Trustee has standing to bring this Motion under 11 U.S.C. § 307.

### **BACKGROUND**

3. On July 31, 2015, Norma Jean Griffin commenced this case by filing a voluntary petition for relief under Chapter 7 of the Bankruptcy Code.

4. Richard M. Fogel was appointed and served as the Chapter 7 Trustee (“Chapter 7 Trustee”). On September 15, 2015, the Chapter 7 Trustee filed a No Asset Report. The Court entered an order discharging the Debtor and subsequently, the Chapter 7 Trustee was discharged and the bankruptcy case was closed.

5. More recently, the U.S. Trustee received notification that Norma Jean Griffin has been offered a settlement concerning a prepetition and post-petition personal injury claim.

6. Upon information and belief, the U.S. Trustee believes that the settlement and proceeds from this lawsuit may be property of the estate pursuant to 11 U.S.C. § 541(a).

### **RELIEF REQUESTED**

7. The U.S. Trustee requests that the Court reopen this bankruptcy case and authorize the U.S. Trustee to appoint a chapter 7 trustee.

8. Section 350 of the Bankruptcy Code provides that:

(a) After an estate is fully administered and the court has discharged the trustee, the court shall close the case.

(b) A case may be reopened in the court in which such case was closed to administer assets, to accord relief to the debtor, or for other cause.

Rule 5010 of the Federal Rules of Bankruptcy Procedure implements Section 350(b).

9. Based on the foregoing, the U.S. Trustee requests that the Court reopen this bankruptcy case and authorize the U.S. Trustee to appoint a chapter 7 trustee to further investigate and determine whether assets are available for creditors and for any other action the chapter 7 trustee deems necessary.

**WHEREFORE**, the U.S. Trustee respectfully asks the Court to enter an order: (1) reopening this case; (2) authorizing the U.S. Trustee to appoint a chapter 7 trustee to represent the estate; and (3) reassigning this case to a Cook County bankruptcy judge and for such other and further relief as this Court deems appropriate.

RESPECTFULLY SUBMITTED,  
PATRICK S. LAYNG  
UNITED STATES TRUSTEE

Dated: August 16, 2022

/s/ Adam G. Brief  
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